

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

URIEL PHARMACY HEALTH AND
WELFARE BENEFIT PLAN, et al.,

Plaintiffs,

vs.

ADVOCATE AURORA HEALTH, INC.,
and AURORA HEALTH CARE, INC.,

Defendants.

Case No. 22-cv-0610

JOINT MOTION FOR ENTRY OF AMENDED PROTECTIVE ORDER

The parties to this action hereby stipulate to and petition the Court to enter the following revised Protective Order, which was agreed to by Plaintiffs, Uriel Pharmacy Health And Welfare Plan, Uriel Pharmacy, Inc., Hometown Pharmacy, and Hometown Pharmacy Health And Welfare Benefits Plan, and Defendants, Advocate Aurora Health, Inc. and Aurora Health Care, Inc. via email correspondence on June 28, 2024. The attached proposed Amended Protective Order has been revised based on the filing of the related litigation *Shaw, et al. v. Advocate Aurora Health, Inc.*, No. 24-cv-157, to permit the sharing of documents produced in the two litigations between those cases' parties. Specifically, the only changes in the proposed Amended Protective Order are to define the *Shaw* action in § (n) of the definitions section, and add mentions to the *Shaw* action, *Shaw* plaintiffs, or *Shaw* counsel in ¶¶ 8, 11, 12, 12, 14, 15, and 16. The parties acknowledge that this Order does not confer blanket protections on all disclosures or responses to discovery and that the protection it affords from public disclosure and use extends only to the limited information or items that are entitled to confidential treatment under the applicable legal principles, including but not limited to General Local Rule 79(d).

Dated: July 16, 2024

Respectfully submitted,

/s/ Jamie Crooks

Jamie Crooks
Michael Lieberman
Alexander Rose
FAIRMARK PARTNERS, LLP
1825 7th Street, NW, #821
Washington, DC 20001
Tel: (619) 507-4182
jamie@fairmarklaw.com
michael@fairmarklaw.com
alexander@fairmarklaw.com

Eric L. Cramer
Daniel J. Walker
Berger Montague, P.C.
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3000
ecramer@bm.net
dwalker@bm.net

Joseph R. Saveri
JOSEPH SAVERI LAW FIRM
601 California Street, Suite 1000
San Francisco, CA 94108
Tel: (415) 500-6800
jsaveri@saverilawfirm.com

Timothy Hansen
James Cirincione
John McCauley
HANSEN REYNOLDS, LLC
301 N. Broadway, Suite 400
Milwaukee, WI 53202
Tel: (414) 455-7676
thansen@hansenreynolds.com
jcirincione@hansenreynolds.com
jmccauley@hansenreynolds.com

*Counsel for Hometown Pharmacy, Hometown Pharmacy
Health and Welfare Benefits Plan, Uriel Pharmacy, Inc.,
Uriel Pharmacy Health and Welfare Plan*

Kevin M. St. John
BELL GIFTOS ST. JOHN LLC
5325 Wall Street, Suite 2200

/s/ Daniel Yanofsky

Anne Johnson Palmer
ROPES & GRAY LLP
Three Embarcadero Center
San Francisco, CA 94111
Telephone: 415.315.6300
Fax: 415.315.6350
anne.johnsonpalmer@ropesgray.com

Daniel Yanofsky
Jane E. Willis
ROPES & GRAY LLP
Prudential Tower, 800 Boylston Street
Boston, MA 02199-3600
Telephone: 617.951.7000
Fax: 617.951.7050
daniel.yanofsky@ropesgray.com
jane.willis@ropesgray.com

Daniel E. Conley
Kristin C. Foster
Nathan J. Oesch
QUARLES & BRADY LLP
411 E Wisconsin Ave, Suite 2400
Milwaukee, WI 53202
Telephone: 414.277.5000
Fax: 414.271.3552
daniel.conley@quarles.com
kristin.foster@quarles.com
nathan.oesch@quarles.com

Matthew J Splitek
QUARLES & BRADY LLP
33 E Main St, Suite 900
Madison, WI 53703
Telephone: 608.251.5000
Fax: 608.294.4914
matthew.splitek@quarles.com

*Counsel for Defendants Advocate Aurora Health,
Inc. and Aurora Health Care, Inc.*

Madison, WI 53718
Tel: (608) 216-7990
kstjohn@bellgiftos.com

*Counsel for Uriel Pharmacy, Inc., Uriel Pharmacy Health
and Welfare Plan*